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WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT, LOUISIANA

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION

UNITED STATES OF AMERICA

Versus

MORRIS LYNN GULETT, and  
CHARLES SCOTT THORNTON

\* Cr. No. 05-30023-01-02  
\* 18 U.S.C. § 371 - Conspiracy to commit  
\* Armed Bank Robbery  
\* 18 U.S.C. § 924(o) - Conspiracy to  
\* Possess a Firearm to commit a crime  
\* 18 U.S.C. § 922(g) Possession of  
Firearm by Convicted Felon  
\*  
\* DISTRICT JUDGE JAMES  
\* MAGISTRATE HAYES

**INDICTMENT**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

(Conspiracy to commit armed bank robbery and to possession of a firearm by a convicted felon)

**A. THE CONSPIRACY:**

Beginning on or about April 8, 2005, and continuing into April 21, 2005, in the Western District of Louisiana and elsewhere, the defendants, MORRIS LYNN GULETT, and CHARLES SCOTT THORNTON, did combine, conspire, confederate, and agree together to commit an offense or offenses against the United States, to wit: Armed Bank Robbery in violation of Title 18, United States Code, Section 2113 (a) and (d); and Possession of a Firearm by a convicted Felon in violation of Title 18, United States Code, Section 922(g), and Use of Firearm During a Crime of Violence in violation of Title 18, United States Code, Section 924(c).

**B. THE OBJECT OF THE CONSPIRACY:**

The object of the conspiracy was to rob a bank using a firearm to acquire money.

**C. THE OVERT ACTS:**

In furtherance of the conspiracy and to effect the object thereof, the defendants **MORRIS LYNN GULETT**, and **CHARLES SCOTT THORNTON**, committed or caused to be committed the following overt acts, among others, in the Western District of Louisiana and elsewhere:

1. **MORRIS LYNN GULETT** directed **CHARLES SCOTT THORNTON** to leave the State of Louisiana and travel to the State of Alabama to locate a bank to rob.

2. **CHARLES SCOTT THORNTON** traveled from the State of Louisiana to the State of Alabama to locate a bank to rob.

3. **MORRIS LYNN GULETT** sent \$200 to a person in another state.

4. On April 21, 2005, **CHARLES SCOTT THORNTON**, did possess and carry from another state into the State of Louisiana a Firestorm, .45 caliber, semi-automatic pistol and .45 caliber ammunition.

5. The allegations of Count 3 of this Indictment are alleged and incorporated as thought fully set forth herein as separate overt acts.

All in violation of Title 18, United States Code, Section 371. [18 U.S.C. § 371].

**COUNT TWO**

(Conspiracy to possess, carry and use a firearm to rob a bank)

**A. THE CONSPIRACY**

Beginning on or about April 8, 2005 and continuing until on or about April 21, 2005, in the Western District of Louisiana, the defendants, **MORRIS LYNN GULETT**, and **CHARLES SCOTT THORNTON**, did combine, conspire, confederate and agree together to

commit offenses against the United States, to wit: Title 18, United States Code, Section 924(c), that is, during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, specifically, Armed Bank Robbery, and they did further combine, conspire, confederate, and agree together to knowingly possess, use and carry a deadly or dangerous weapon (firearm), to wit: an SKS, 7.62 x 39mm caliber, semi-automatic assault rifle, another SKS, 7.62 x 39mm caliber semi-automatic assault rifle, a Mossberg 12 gauge shotgun, and a Firestorm, .45 caliber, semi-automatic pistol in furtherance of this crime, all in violation of Title 18, United States Code, Sections 924 (o).

**B. THE OBJECT OF THE CONSPIRACY**

The object of the conspiracy was to knowingly possess, use and carry a firearm during the robbing of a federally insured bank.

**C. THE OVERT ACTS**

In furtherance of the conspiracy and to effect the object thereof, the defendants, committed or caused to be committed the following overt acts, among others, in the Western District of Louisiana:

1. On April 21, 2005, CHARLES SCOTT THORNTON, did possess and carry from another state into the State of Louisiana a Firestorm, .45 caliber, semi-automatic pistol and .45 caliber ammunition.

2. The allegations of Count 3 of this Indictment are alleged and incorporated as though fully set forth herein as separate overt acts.

All in violation of Title 18, United States Code, Section 924 (o).

**COUNT THREE**

**(Possession of a Firearm by a Convicted Felon)**

On or about April 21, 2005, in the Western District of Louisiana, the defendants, MORRIS LYNN GULETT and CHARLES SCOTT THORNTON, aiding and abetting each other and aided and abetted by each other, and after MORRIS LYNN GULETT was convicted in a court of a crime punishable by imprisonment for a term exceeding one year (a felony), MORRIS LYNN GULETT did unlawfully receive and possess a firearm, to wit, an SKS, 7.62 x 39mm caliber, semi-automatic assault rifle, another SKS, 7.62 x 39mm caliber, semi-automatic assault rifle, a Mossberg 12 gauge shotgun, each firearm which had traveled in and affected commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2) and 2. [18 U.S.C. § 922(g)(a) and §924(a)(2) and §2].

**COUNT FOUR**

**(Forfeiture of firearm)**

A. The allegations contained in Counts One, Two and Three are incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924 (d)(1). [18 U.S.C. §924 (d)(1)]

B. As a result of the violations alleged in Count Two of this Indictment, the defendant, CHARLES SCOTT THORNTON, shall forfeit to the United States a Firestorm,


**.45 caliber, semi-automatic pistol and .45 caliber ammunition.**

**A TRUE BILL.**

**DONALD W. WASHINGTON  
UNITED STATES ATTORNEY**

  
**GRAND JURY FOREMAN**

**By:**

  
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